

Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

ECFS FCC.GOV  
5/11/2017

In Regards to Proceedings 17-108, Restoring Internet Freedom.

Dear FCC,

Thank you for taking the time to read the public comment on this filing. We appreciate your thoughtful consideration of the effects 17-108 will have on the American people via their internet browsing.

I am a Silicon Valley Marketing Executive at an Advertising technology company. It is my job to understand how online advertising functions and how to use persuasion to convince minds to purchase my product. I know manipulation, it's my job.

The FCC acted correctly when they reclassified ISPs from Title 1 to Title 2. Internet Service Providers (ISPs) have unique access to their users and have a powerful ability to manipulate their user's behavior. Because of the nature of the business, like myself, many Americans have very few choices in regards to who they can purchase their internet access.

Most of giant telecom companies have additionally acquired many assets in media. Media assets they have an intrinsic desire to see be successful. After the AOL acquisition, Verizon had no reason not to favor Huffington Post, TechCrunch and Moviefone. By suppressing their competitors throughput. Under the proposed reversal, these ISPs have the ability to rig the deck in their own favor. And they have every incentive to do so.

It may seem insignificant to slow down a site by as little as 33%. But data shows that fractions of a second can have deleterious effects on user engagement. If video falters or images load slowly, website visitors will quickly transition to an experience that loads as fast as they have come to expect from current speeds.

A tiny hypothetical. Microsoft strikes a deal with AT&T. Suddenly all traffic streaming over Sony's Playstation network experiences delays. After a few weeks of buffering during game play fanatical Call of Duty fans start getting irritated. They can't play against their friends like they used to. But their friends who have the Xbox haven't experienced any issues. Now purchasing an Xbox seems like a much better game-play experience than the Playstation. And Microsoft's gamble pays off.

An ISP like AT&T throttling just a small fraction of the speed to a site could put it out of business. Think of all the small business startups that are the thriving job creation engine of our economy that gain a global foothold simply because of their access to the internet. If a large corporation paid an ISP they could crush their startup competition overnight.

When you own the traffic. You get the advertising dollars.

Congress recently rolled back regulations that limited ISPs from selling advertising data. ISPs have a unique vantage point over the entirety of your online activity. This is a stark difference from even the giants Facebook & Google. They have enormous reach but only when a user decides to engage with their content. But as a modern internet user, I know when I get something for free, there is some way I'm being monetized in order to support the free thing I'm receiving. It is my choice to access a particular site while browsing online.

It isn't a choice to have all online behaviors monetized.

Think about everything your ISP knows about you. Every search query and post, every page visit, each video watched and every other moment in your most private life. All available for sale now.

Before the world knows it, your ISP knows it. That you're pregnant, or considering moving, or that you might be gay. Before you can tell your mom; you could already be getting ads for maternity clothes (or housing or Absolut vodka).

Your ISP knows everything about you. And now, so do I.

17-108 takes these new found abilities to new heights. If I'm now allowed to sell all of your data not just to the highest bidder, but all the bidders. And I can get additional compensation to suppress certain traffic in preference of others.

I'm not worried that ISPs will take advantage of this new found cash flow. I know it will happen, because if it were my decision I'd take it. 100% of the time. As an executive, it's my job to grow revenue & profits for my organization. I will take every legal measure I can to ensure my company's growth. And so will ISPs.

There is something chilling about an omnipotent, all knowing company tracking everything you watch, type or say. If you think that's ridiculous, that "the sheer volume of online traffic is too great" to analyze and make meaningful conclusions. Well, you are naive to the reality of data science. And in fact, the sheer volume is the - multiplier effect - that allows such deep understanding of aggregate behaviors.

Data Science = Big Money.

But the new proposal is a step too far - the emotional effect of traffic throttling on top of this already massively persuasive advantage Congress has already provided. These

are not fictitious fairy tales, but the reality of business here in Silicon Valley and elsewhere throughout the world. It is how empires like Google were built. We were the ones who clicked agree on the terms of service that got us here.

But giving ISPs the added benefit to control demand itself, is one step too far. More than one; the complete monetization of online behavior is already beyond the pale. To hand ISPs the privilege to control behavior and manipulate their users into preferring the business which pays it the most, is a fundamental coercion of the American people beyond which we've ever seen.

The FCC has a fundamental duty to the American people above that of any corporation to protect the privacy of the people it protects. If this provision is approved it will be a dereliction of that duty.

It is not too late to stop this massive leak of data to every bidder and manipulating behavior through speed throttling.

Don't let the American people's most private experiences get both sold and influenced. This will have disastrous effects on people's trust for the internet - precisely at the time when IoT (internet of things), AI & ML (artificial intelligence & machine learning) are exploding within our daily lives.

Please don't delay. Even if you don't understand how "all of this works", take it from those of us who do. This is a very bad deal for the American People.

Now is the time to protect individual freedom.

Adam New-Watson